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May 26, 2021

BY EMAIL AND ECF

Hon. Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Pinto-Thomaz, et al., 18 CR 579 (JSR)

Dear Judge Rakoff:

I am writing on behalf of defendant Jeremy Millul to respectfully request the early termination of the defendant's supervised release, which is presently scheduled to end on May 21, 2022. In the alternative, we respectfully request that Mr. Millul be permitted to travel freely between Florida and New York while serving the remainder of his sentence. Mr. Millul's Probation Officer, Zondra Jackson, consents to the early termination of Mr. Millul's supervised release, and the government, by AUSA Andrew Thomas, takes no position.

The reason for this request is that Mr. Millul's son attends a special needs school in Florida and yet the defendant's place of business is located in Manhattan. Despite this situation, Probation has indicated that the maximum amount of time that Mr. Millul is permitted out of New York and in Florida to visit his family is just five days per month, which may only be utilized in a single monthly visit. In an attempt to resolve this issue and spend more time with his family, Mr. Millul requested that his supervision be transferred to Florida, however, the reverse issue occurred: he was not permitted sufficient time in New York to run his jewelry business and therefore it was transferred back to New York.

As Your Honor may recall, on March 29, 2019, Mr. Millul pleaded guilty to one count of Conspiracy to Commit Securities Fraud, in violation of 18 U.S.C. § 371. On July 30, 2019, Your Honor sentenced Mr. Millul to five months incarceration to be followed by two years supervised release. Mr. Millul self-surrendered to FCI Allenwood on January 6, 2020 and was released by the Court on May 21, 2020, some two weeks prior to the termination of his prison term due to health concerns relating to the COVID-19 pandemic. Since then, Mr. Millul has remained on supervised release without issue and has already paid the \$20,000 fine and \$100 special assessment imposed as part of his sentence.

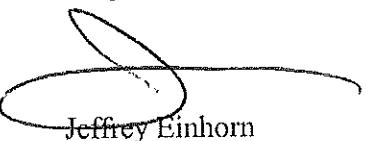
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The statute governing early the termination of supervised release, 18 U.S.C. § 3583(e), provides that the Court may terminate such a term “and discharge the defendant released at any time after the expiration of one year of supervised release … if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice.” Mr. Millul, who has been on supervised release for more than one year, respectfully submits that he meets the criteria for such relief due to the travel issue outlined above concerning his family and business.

Accordingly, we respectfully request Mr. Millul’s period of supervised release be terminated, or in the alternative, that his conditions of supervision be amended to permit his travel between New York and Florida.

Respectfully submitted,



Jeffrey Einhorn

cc: All counsel (by email and ECF)
USPO Zondra Jackson (by email)

Supervised release terminated.
SO ORDERED:


Hon. Jed S. Rakoff, U.S.D.J.

5-27-21